

October 22, 2019

Ms. Jill A. Martin
Executive Vice President and
Chief Compliance Counsel
The Trump Organization
725 Fifth Avenue
New York, NY 10022

Dear Ms. Martin:

We write seeking information regarding the Trump Organization's licensing agreement for Trump Towers Istanbul-Sisli.

The U.S.-Turkish relationship is historically important and it is particularly sensitive at the current time. Therefore, it is critical for Congress to understand whether the President's decisions are being influenced by potential financial conflicts of interest.

For example, President Trump recently announced a decision to precipitously withdraw U.S. troops from Northern Syria and open the door to a Turkish military offensive against Kurdish forces who have been valuable partners of the U.S. in the fight against the Islamic State. In addition, the Trump Administration has been repeatedly pressed to extradite an individual of interest to Turkey and forgo criminal prosecution of Turkish individuals and banks involved in bribery and fraud as part of evading U.S. sanctions on Iran. Turkey has also purchased Russian air defense technology over the strong objections of the United States. Finally, because President Erdogan is scheduled to meet with President Trump in Washington, D.C. next month, it is important for Congress to be aware of the President's financial interests that could influence the formation of U.S. policy during those discussions.

As you are aware, the Trump Organization continues to earn substantial revenue in the form of royalties from a licensing agreement for Trump Towers Istanbul-Sisli that allows the owners of the property, Ortadogu Otomotive Ticaret AS, to use the "Trump" name and mark. This revenue is then passed through to President Trump in the form of royalties paid to two Trump entities, Trump Marks Istanbul II LLC and Trump Marks Istanbul II Corporation. According to public financial disclosure forms filed by the President, he has personally earned between \$1.2 million and \$7 million in royalties from entities affiliated with Trump Towers Istanbul-Sisli since becoming President. Additionally, Ivanka Trump, who serves as an adviser to the President in the White House, has listed in public financial disclosures that she is a license holder in Trump Marks Istanbul II LLC.

In a December 2015 interview in his capacity as a presidential candidate, President Trump stated in a radio interview during a discussion on U.S.-Turkey relations: "I have a little conflict of interest because I have a major, major building in Istanbul. And it's a tremendously successful job, it's called Trump Towers...two towers, instead of one." Furthermore, the opening ceremony of the property in 2012 was attended by the then-Prime Minister of Turkey, Recep Tayyip Erdogan, suggesting an interest in the property from the highest levels of the Turkish government. In June of 2016, President Erdogan stated "[t]hey put that brand on his building and it must be swiftly taken down", following remarks by then-candidate Donald Trump that he found offensive, highlighting the potential for adverse actions against the Trump Organization.<sup>2</sup>

We agree with the President in his assertion that the Trump Organization's dealings in Turkey present a financial conflict of interest for him and are greatly concerned this conflict may be influencing U.S. foreign policy toward the Erdogan government.

In order to better understand the Trump Organization's licensing agreement for Trump Towers Istanbul-Sisli, please provide answers to the following questions no later than November 12, 2019:

- 1. For the years 2017, 2018 and 2019, please provide the total dollar value of income earned by the Trump Organization related to its licensing agreement with Ortadogu Otomotiv Ticaret A.S. or any other Turkish entities that own Trump Towers Istanbul-Sisli.
- 2. Under what terms can Ortadogu Otomotiv Ticaret A.S. or any other Turkish entities that own Trump Towers Istanbul-Sisli terminate or revoke its licensing agreement with the Trump Organization?
- 3. Has the Trump Organization or Ortadogu Otomotiv Ticaret A.S. or any other Turkish entities ever sought approval from the Turkish government in order to enter into a licensing agreement for Trump Towers Istanbul-Sisli, and what authority does the Turkish government have to remove the Trump name from the building or materially impact the licensing agreement?
- 4. Has the Trump Organization or Ortadogu Otomotiv Ticaret A.S. received any communications from U.S. or Turkish government officials regarding any matter of U.S.-Turkish relations, including but not limited to the recent Trump Administration announcement of the U.S. withdrawal and Turkish offensive into Northern Syria?

<sup>&</sup>lt;sup>1</sup> Philip Bump, *Trump's Decision on Syria Crystallizes Questions About His Business — And His Presidency*, WASH, POST, Oct. 7, 2019, https://www.washingtonpost.com/politics/2019/10/07/trumps-decision-syria-crystallizes-questions-about-his-business-his-presidency/.

<sup>&</sup>lt;sup>2</sup> Ned Levin, *Erdogan Wants Istanbul Towers to Lose Trump Name*, WALL ST. J., June 25, 2016, https://www.wsj.com/articles/erdogan-wants-istanbul-towers-to-lose-trump-name-1466855822.

Thank you for your attention to this important matter.

Sincerely,

Tom Udall

United States Senator

Tammy Dackworth United States Senator

th Warren Richard Blumentha

United States Senator United States Senator